

Firm I.D. #412

Document #: 772972

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

GD DEAL HOLDINGS, LLC)

Plaintiffs,)

V.)

Court No. 08-CV-1722

SURINDER MULTANI; ABBE PROPERTIES,)
LLC; SAPPHIRE SUPPLY, LLC; JGG)
INVESTMENTS, LLC; ABBE CAPITAL AND)
LEASING, LLC; ABBE MANAGEMENT)
GROUP, LLC; FIFTH THIRD BANK; CITIBANK;))
VENDOR CAPITAL GROUP; BABAJI PS, LLC;)
CAPITAL ACCESS & INVESTMENTS, LLC;)
PETROZONE PETROLEUM II, INC.;)
G & S PORTAGE, INC.; SAFANPREET)
MULTANI; AND SURINDER MULTANI, IN)
HIS CAPACITY AS TRUSTEE FOR GURPRIYA)
KAUR MULTANI IRREVOCABLE TRUST,)
GURPAP SINGH MULTANI IRREVOCABLE)
TRUST, AND JAPVI SINGH MULTANI)
IRREVOCABLE TRUST,)

HON. JUDGE ELAINE E. BUCKLO

Defendants.)

NOTICE OF MOTION

To: Diane R. Sabol, Lucia Nale, Nicole J. Highland, Mayer Brown, LLP, 71 South Wacker Drive, Chicago, IL 60606-4637

Scott A. Bachert, William F. Coddell, Harned, Bachert & Denton LLP, 324 East Tenth Avenue, P.O. Box 1270, Bowling Green, KY 42102-1270

cc: Alan C. Thompson, Vendor Capital Group, 4191 Fayetteville Road, Raleigh, NC 27611

You are hereby notified that we will appear in the United States District Courthouse located at 219 South Dearborn Street, Chicago, Illinois, before the following judge or other judge sitting in his stead at the place and time specified and ask for a hearing on the attached Plaintiff's Motion for Order of Sale, a copy of which was electronically filed on June 10, 2008.

| Judge | Room | Date | Time |
|------------------------|------|---------------|-----------|
| Judge Elaine E. Bucklo | 1441 | June 30, 2008 | 9:30 a.m. |

WILLIAMS MONTGOMERY & JOHN LTD.

/s/ Thomas F. Falkenberg
THOMAS F. FALKENBERG

Attorneys for the Plaintiff
WILLIAMS MONTGOMERY & JOHN LTD.
20 North Wacker Drive
Suite 2100
Chicago, IL 60606
312-443-3200

CERTIFICATE OF SERVICE

I, Thomas F. Falkenberg, hereby certify that on June 11, 2008, I electronically filed the foregoing **Notice of Motion** with the Clerk of the Court using the CM/ECF system which served all parties who are currently on the Court's Electronic Mail Notice List, by operation of the Court's Electronic Filing System.

/s/ Thomas F. Falkenberg